

Re: United States v. Michael Dolce (9:23-cr-80063)

10/18/2023

Judge Donald M. Middlebrooks  
Paul G. Rogers Federal Building and U.S. Courthouse  
701 Clematis Street  
Room 257  
West Palm Beach, Florida 33401

Dear Honorable Judge Middlebrooks

I am writing this letter on behalf of my dear friend Michael Dolce. Michael and I have been friends for almost 40 years. I have known Michael since our high school and college days and while we have lived far apart, we have kept in frequent contact over the years. During this time he has proven to me and my family to be a person of the utmost character.

I state with zero hyperbole that in the past I have told Michael that to me, he is the closest thing to a super hero that I have ever encountered. Building on a foundation of traumatic abuse as a child, I watched him build a life trying to right similar wrongs inflicted on others. And that work has helped dozens and dozens of victims to find justice.

It is my understanding that he has been attending therapy consistently to attempt to deal with his past trauma, reflecting a strong intent to continue to better himself. Recently I have been trying to help him with his book relating to his experiences both raising and losing his son Ilya and the impact that loss has had on him. I cannot help but believe that what Michael endured hearing his son's last words from hundreds of miles away left him unimaginably hurt, and that pain needs attention from a caring professional.

I am well aware of the charges he is facing, but based on his prior conduct, attempts to resolve the difficulties he has encountered and good works throughout his life I would like to plead for leniency.

Thank you.

Yours sincerely,



Kenneth B. Cline  
7630 Highland St  
Springfield, VA 22150  
(703)-623-7635  
kenbcline@gmail.com

Judge Donald M. Middlebrooks  
Paul G. Rogers Federal Building and U.S. Courthouse  
701 Clematis Street  
Room 257  
West Palm Beach, Florida 33401

Leonard S. Feuer, P.A  
500 S. Australian Ave.  
Suite 500  
West Palm Beach, FL 33401

Re: United States v. Michael Dolce (9:23-cr-80063)

Your honor, Judge Middlebrooks,

It is the purpose of this letter to provide a character statement and leniency to Michael Dolce. I have known the defendant for a few years and have had the privilege of witnessing and working with colleagues in my previous career as a violent crime detective in Washington, DC. I wrote this on my own and not by request.

It has been my privilege to work with many prosecutors, both state and local, and defense attorneys in many areas of investigation in the past, all of whom at one point or another had the opportunity to see, work, and witness the growth and character of Michael Dolce firsthand, including myself. Throughout my time knowing Michael, he has consistently demonstrated the qualities of integrity, compassion, and a sense of responsibility.

I know he has actively engaged in the community, volunteering time and resources to support those in need. Michael's commitment to personal growth and rehabilitation is evident in his efforts to address mistakes and make amends. As a former criminal investigator, I have spent countless hours and days with defendants, survivors, and families of both, and knowing what Michael Dolce is charged with, I firmly believe that he is capable of contributing positively to society, and I implore the court to consider these qualities when determining an appropriate sentence.

Thank you, respectfully,  
Brian J. Devine  
Detective Grade 2  
DC Metropolitan Police Department  
Washington, DC  
(retired)  
C: 571-232-4308  
Email: brian3d29@gmail.com

1/1/2023

# The Grail Law Firm

Efrem M. Grail, Esq.  
428 Boulevard of the Allies, Suite 500  
Pittsburgh, PA 15219  
(412) 332-9101, ext. 101  
egrail@graillaw.com

November 27, 2023

*Via Electronic Mail, In Care Of Defense Counsel: [1feuer@feuerlawfirm.com](mailto:1feuer@feuerlawfirm.com)*

Hon. Donald M. Middlebrooks  
Paul G. Rogers Federal Building and U.S. Courthouse  
701 Clematis Street  
Room 257  
West Palm Beach, Florida 33401

Re: United States v. Michael Dolce, 23-CR-80063

Your Honor:

I have stood on the other side of the courtroom as a prosecutor, and next to defendants there as their counsel at hundreds of sentencing, but have never written in support of a person facing one until now. I hope my first attempt here provides assistance in your task of pronouncing sentence in this matter, especially considering that I have never even met Mr. Dolce in person.

I am the principal of a small specialty litigation practice in Western Pennsylvania, following 17 years as a partner at a top-tier, international law firm and service as a criminal prosecutor before that. We have a reputation for maintaining a robust *pro bono* practice, especially in First Amendment/free speech, religion and voting matters. Likely as a result, Mr. Dolce identified our firm and reached out in the Fall of 2021, seeking our help as local counsel in defending a defamation case in our county court. He had taken the civil matter defending a retired teacher for advocating on behalf of a child sexual abuse victim to an official at the school which employed the minor's teacher, the alleged abuser. The teacher, who remained on administrative leave and was barred from the classroom, sued for libel.

As the Court is no doubt aware, the sad truth is that most lawyers don't do nearly enough – or any -- *pro bono* work, or take seriously the importance of representing the unrepresented and underrepresented. Michael Dolce was not one those lawyers. I learned on a number of occasions when we spoke at length that he was committed to using his legal education and experience to do good, not just to do well. He had a keen understanding of the pressures on big firm lawyers for profitability, and of the ways to integrate public interest service into a top-notch, commercial practice. His commitment to helping people was real, and the cases he undertook for little or no money was testament to that. At the time of his arrest, I was looking forward to meeting him in person when our practice next took me to South Florida.

Michael was personally involved in our case. He spent long periods of time crafting the arguments on behalf of our client. In doing so, his input demonstrated a keen, intuitive understanding of the

**CONFIDENTIAL**

Hon. Donald M. Middlebrooks  
*United States v. Michael Dolce*, 23-CR-80063  
November 27, 2023  
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personal distress defendants in litigation undergo, especially for someone without resources or experience. His knowledge of the substantive law was enviable, and his generosity in giving of his time to my younger associates, including one who had never litigated a libel case before. That alone is noteworthy, but hardly deserving of significant impact on a criminal sentence, especially given the facts of the instant case. For that, I ask the Court to consider what I observed from our co-*pro bono* counsel.

There is no doubt in my mind that Michael deeply felt the pain and anguish of the child victim for whom our client had, for no fee, spent her time counselling, providing emotional support and speaking out on their behalf. The care and understanding he had for child victims of sexual abuse was real, and their pain, it seemed to me, was his pain.

I do not know what causes people deep down inside to do the things they do. But I am certain that Michael Dolce struggled mightily in his being with whatever demons he carries inside. This is not a person who delighted in pain and suffering. It was clear when he spoke that this is a human being who suffered his own tragic pain, and that it did not hover too far from the surface.

A human being like that deserves our help, not our disdain. I ask that this Court consider all the good that is in this person, and not just what sits between the four black-and-white corners of a federal probation Presentence Investigation Report. There is simply no interest identified in the federal Sentencing Guidelines, or for any moral society, in punishing this defendant further. He has no doubt accomplished that many times over himself.

Thank you for this opportunity to write on behalf of Mr. Dolce. If I knew him better, I think I would be proud to call him my friend.

Very truly yours,

/s/ Efrem M. Grail  
Efrem M. Grail

**CHRISTOPHER R. & KAI LI FOUTS JETTE**  
**500 S. Australian Avenue, Suite 720**  
**West Palm Beach, Florida 33407**  
**[cri@eisenbergandfouts.com](mailto:cri@eisenbergandfouts.com)**  
**[kaili@eisenbergandfouts.com](mailto:kaili@eisenbergandfouts.com)**  
**561-659-2009**

Honorable Donald M. Middlebrooks  
Paul G. Rogers Federal Building and United States Courthouse  
701 Clematis Street, Room 257  
West Palm Beach, Florida 33401

**RE: Letter on behalf of Michael Dolce**

Dear Judge Middlebrooks,

Please allow this letter to serve as a request for leniency on behalf of Michael Dolce. We have known Michael for approximately 25 years. We met him in church, and have had a friendly relationship with him due to seeing him most Sundays.

We knew Michael's three children and our own children were friendly with his children through Vacation Bible School. Michael gave tirelessly of his time for Sunday school classes every week for the youth in the church which was strictly a volunteer position. The children enjoyed his classes, and always felt they were interesting and thought provoking. Having personally sat in his youth class to observe, Michael encouraged the children to think critically, interact with each other, and he created a safe place for them to feel comfortable when asking questions about religion and faith. He showed great compassion and empathy towards the children and did an admirable job teaching them the same qualities.

We watched as Michael suffered immensely through the tragic death of his oldest son. Michael was devastated by the loss of Ilya at such a young age, and it was very traumatic for him. Having attended the funeral for Ilya, we all saw and felt the tremendous loss Michael was experiencing.

While we were generally aware of Michael's childhood trauma, we felt he demonstrated great strength in overcoming that trauma. We thought he set a good example of how one can do so under the most difficult of circumstances.

We do not want to minimize the seriousness of this case. We simply want to share the fact that Michael had a positive impact on many who had the opportunity to know him, and learn from him in his classes. As attorneys with experience in criminal defense practice, and with an understanding of the Court's discretion to grant a variance to the advisory sentencing guidelines, we hope to convey our belief that Michael has made extraordinary and positive contributions in contrast to the serious charges in his case.

We thank you for taking the time to consider our letter on behalf of Michael.

Very truly yours,

CHRISTOPHER R. JETTE



KAI LI ALOE FOUTS JETTE

Leonard S. Feuer, P. A  
500 S. Australian Ave.  
Suite 500  
West Palm Beach, FL 33401

October 18, 2023

Re: United States v. Michael Dolce (9:23-cr-80063)

To the Honorable Judge Middlebrooks,

I write to you to speak about the character of my friend of 35 years, Michael Dolce.

He is a victim and survivor of threats, trauma, and unspeakable sexual abuse in his prepubescent and adolescent formative years. He has personally confided in me about the heartache and pain he has had to overcome in life. Also, about how he realized and sought out help through the assistance of many therapists and survivor advocate associations for these numerous harms thrust upon him at such a tender age. I am so proud of him for having the courage and humility to accept responsibility and seek help.

It is impossible as a layman to fully comprehend what the incarceration of one's father by the federal government can do to a young mind or what the year-long sexual abuse by a neighboring father-and-son duo at the age of 9 can do to a young mind or the loss of one's mother, all before the age of 12, can do to a young mind.

It's unimaginable thinking about what happens to you after hearing your child take their last breath on the phone, while you listen to them hit the ground, following the deafening sound of a bullet from their own gun. It's hard to imagine what that might do to a man's faith and spirit; but I can tell you what it did to Michael; it destroyed him.

Thankfully, God saw fit to give him a beautiful daughter from his 1st marriage and a wonderful boy later in life, from his 2nd marriage that he is still responsible for, and they would both be lost and heartbroken without him.

I think about Michael as a young boy often. Teaching his younger brother to pray. Tremendous responsibilities placed on his small shoulders. But Michael persevered and he excelled, and he attended college a year earlier than everyone else in his grade.

Not only am I proud to call him my **friend** but I refer to him as **family** and I will always be there for him and his family to support them in any way I can. My very own strict Greek parents always loved and trusted him with me whenever a group of us were out. He was my protector even though we were the same age.

Through the years my heart swells with pride over his accomplishments. Some of my fondest memories were when we introduced our children to each other and when we attended each other's 2nd weddings. He was always a loving, caring and compassionate friend.

I feel lucky to have had the privilege of seeing his professionalism in his life and his career. He has volunteered in the community for 2 decades helping those in need and has shown and taught the importance of both giving back to your community and accepting responsibility for your actions.

From all of these things I respectfully ask for leniency for him and feel that he would benefit immensely from being in an institution that can finally and properly help him deal with the multitude of traumas he was dealt in this life. I feel that he is capable, nay deserving, of redemption and he can still provide a great deal of value to our society.

As a Christian woman, I am not only aware of his charges but can hate the crimes he has committed and still love the man for the child of God he is. I pray that you show him mercy.

May God bless you in making your decision and may God bless Michael's family.

Thank you for taking the time to read this letter. I am available to answer any questions you might have, and I truly hope this letter will make an impact on how you look at Michael.

Respectfully,

*Vasiliki H. Devine*

Vicki Devine

Compliance Analyst **C3M Power Systems LLC**

1030 Hampton Park Boulevard, Suite 200 | Capitol Heights, MD | 20743

c 571.236.6185, [vicki.devine@c3mpowersystem.com](mailto:vicki.devine@c3mpowersystem.com)

11 December 2023

Hon. Donald M. Middlebrooks  
Paul G. Rogers Federal Building and US Courthouse  
701 Clematis St Rm 257  
West Palm Beach, FL 33401

Dear Honorable Judge Middlebrooks,

I'm writing on behalf of my friend and neighbor, Michael Dolce. I just care a lot about what happens to him; I think anyone who knows him would. Most of his record as an outstanding citizen is already well known and public - for his church, his students, abused children, and countless victims, beyond just his own clients. As I only knew him on a more personal level, not his public or professional self, I hope I can still help.

I have been working in emergency services for twenty-three years - on the overnight shift, where things get dark and weird. I have my struggles. This is where Michael inadvertently became very important to me, blooming into a friend I didn't think I needed over the past two years. It all started because I felt *safe* in his presence, which is unusual for me (with my anxiety with people), but he was always so respectful of space, both physical and mental - as in I was never forced into a conversation, especially not while wearing my Do Not Disturb Headphones, as people like to do. Some other neighbors were struggling with their own shadows, and trusted me. I helped as much as I could, and always recommended they find Michael if they ever couldn't find me (like overnight), "He can help you, he's safe." Even my young nephew, when he visited, was told as we passed Michael's door, "If something happens to me, you call 9-1-1, and you come *here*, so he can keep you safe - you'll have to knock a lot and *very* hard, it takes a moment." I have yet to see evidence that any of that trust was misplaced. I would still suggest my nephew seek him out for help; I would still recommend him to those neighbors.

I know he struggled too. I've rarely seen someone so eager to be of help, to try and make things better for someone – anyone. Even when he was exhausted, he'd help - like the time I found him arriving home late one night, and volunteered him to help fix the car of this random lady who had a dead battery, though his personal battery looked about dead itself. There were a few times he was still so eager to be of use, though he was clearly ready to fall over. At one point, when I showed concern he was struggling, he joked that he was just, "trying to keep the pieces together," that he'd survived worse. I asked if I could give him a hug to help him, "smoosh those pieces together for now," and he accepted. I don't know how much it helped, I'm terrible at hugs, but he's so full of love for people, like an inner light, it's easy to want to help him back. It hurts to see him hurt.

That light was magnified on Saturdays - pardons, but you've likely never seen anything quite as beautiful as this man's glee on those mornings, as he excitedly waited for his son, and whatever adventures they had planned for the day (the "dynamic duo" of our building). The two of them together were infectious with their joy, and all of us were blessed to witness such a loving care-bond. I've had a lot of people who knew him more distantly ask if they still get to see each other, *worried* that they don't – it would be tragic. It was often the first question they asked.

I'm sure many people were emotionally rocked when they read about his arrest, especially if from a source that shared details from the report. But for me, in a life soaked in everyone's worst days, I'm used to the cold descriptions of police reports, like sturdy ground. I'm used to the motivations and limits of their authors. So I read it with a sense of relief, and a lot of concern. It did not sound like a *good* night at all. When full context is considered, what is and is not said, it reads very much like a spiral, a crisis – enough to make me wonder if I shouldn't be *glad* the FBI arrived as they did. It might be useful to ask what he was going through, if he can even answer that yet. I was also concerned about the effect the news might have on his clients, as he was always so concerned about them. Would they feel duped? Was their trust betrayed? For some, it's entirely possible, but I have hope that others can see through the shock (in time) and recognize someone who's shared their pain beyond his limit, and needed help for himself. The neighbors who have "been through some things" are the same ones who don't ask me for details on his case (like I'd know – or tell), instead they're concerned with *how he is*, "Is he okay?" They were never his clients, I don't know if they ever talked to him about anything, but he's one of their own, they know what it's like, and they care.

The punishments he's giving himself in his mind and in his heart are likely harsher than any you can administer - that's not a challenge, Your Honor, just the way I know traumas work after lurking around until you're too exhausted to fight them (a latent virus, waiting for your immune system to weaken). Michael has made a life out of fighting other people's monsters, and he's done a phenomenal job at it, but all he's likely to see now is his shame, and his very rare contribution to harming the ones he's been working so hard to protect. I still worry about him. He has a purpose to continue, after he gets proper care for himself, and many more people who could dearly use his help. I can only relay my familiarity with how *good* he is, and how sorry, plus my own experience with a lot of hurting people, then hope that you will consider the whole of his life and that night, and find it in your wisdom to have mercy in your judgement, and leniency.

Thank you for your time, and be well



K Bratager



David F. Baron  
Jon M. Herskowitz  
Also admitted in Colorado  
And Washington, D.C.  
Stuart F. Cohen

Of Counsel  
Jack Herskowitz  
Karen B. Bernstein  
Lori Friedman

December 6, 2023

Hon. Donald M. Middlebrooks  
Paul G. Rogers Federal Building and U.S. Courthouse  
701 Clematis Street  
Room 257  
West Palm Beach, FL 334013

**Re: *United States v. Michael Dolce, 23-CR-80063***

Your Honor,

I have been involved in the prosecution of sexual abuse cases for the entirety of my 34 years in practice. Initially as an Assistant State Attorney under Janet Reno and then as a civil practitioner.

I first met Michael Dolce in a sexual abuse case in which we shared interests involving an institutional defendant. I was immediately impressed and awed by Michael because of his candor in discussing his history as a survivor and then in his passion to seek a justiciable remedy for the victim. He went above and beyond and did not relent when discussing settlement nor was deterred by the tough legal issues or the defendants threatening trial.

We spoke a lot and discussed our backgrounds growing up. I would discuss often that my mother was a social worker assisting victims of domestic and sexual abuse for over 35 years in New York City and what she taught me. I knew of Michael's "demons." I knew he still struggled with them. He would often talk about the difficulty survivors and himself face in life. He was always forthright and never hid his struggles.

I was upset but not shocked when I heard Michael was arrested and the crime charged. I am well aware that victims of childhood sexual abuse are struggle with child pornography or other inappropriate actions as if they feel they need to punish themselves by reliving their childhood trauma.

Michael assisted, stood up for, and related to victims of terrible sex crimes. He stood out and assisted countless victims not only in litigation but in sharing his life and letting them know they were not alone and could live productive and successful lives.

It's been many years since I practiced in the criminal area and I'm not sure how much latitude this Court has with the sentencing guidelines, but I believe that the system and hopefully this Court will recognize what Michael has contributed to other victims of childhood sexual abuse and his potential to continue to do so. Michael need not be a lawyer to continue assisting abuse victims, but he cannot do that behind bars. I know he still wants to assist, wants to get the appropriate treatment (finally) for his trauma (which he cannot receive in jail), and continue to live a productive life for his family, friends, clients, and other victims.

I hope that the Court considers what Michael has accomplished and what he can accomplish and weighs those factors when deciding the appropriate punishment.

Very Truly Yours,



Jon M. Herskowitz, Esquire

JMH/j

To whom it may concern;

I have known Michael Dolce for the better part of thirty years. We are both members of Holy Trinity. During those decades I have observed Michael as a concerned and caring father, a dedicated and faithful teacher, an engaged parishioner, and a good friend.

I remember particularly when a mutual friend lost her apartment as a result of her bipolar disorder. She had alienated many of her friends, so packing her things and moving them out was left to a very few. Michael was one. A friend in need, as they say.

The efforts he extended on his son Ilya's behalf, seeking specialists, treatments, therapists, programs, and including him in the community at Holy Trinity were, in my opinion, exemplary. I called Ilya friend as well.

Michael's record as litigator and advocate stands as a testament to his resolve. The use of his gifts and abilities in service to his clients and the community have benefitted many.

Personally, given what I have just communicated, the cause for the writing of this letter is a painful paradox.

Michael's offence, to which he has admitted and expressed remorse for, is egregious.

As a father and grandfather, I am grateful for every effort made by law enforcement to stop and hold accountable those who exploit the innocent and vulnerable. Michael has been a part of that very process. Now he knows it from both sides.

Jesus, the incarnate God of my understanding, is and will continue to redeem us. I believe Michael and I share this understanding. I know also His redemptive power is available to Michael regardless of his sentence. As Michael's friend, I intend to participate in that journey.

Michael is already experiencing the consequences of his actions, in his life and the lives of those effected. Some will be lifelong.

My hope and prayers are that the court consider the whole of Michael's story and adjudicate with both mercy and justice.

Respectfully,

*Brian Nehemias*

Brian Nehemias

To: The Honorable Donald M. Middlebrooks

From: Gemma Staub Hoskins

Re: Michael Dolce

Dear Judge Middlebrooks:

My name is Gemma Hoskins. I was Michael Dolce's second grade teacher. The year he was in my class is the same year Michael was being sexually assaulted at the end of a shotgun by his adult neighbor and the neighbor's son. I did not know about the abuse at the time. If I had known, I could have stopped it. Michael did not remember who his second-grade teacher was until he saw me in the Netflix series The Keepers. He only knew that school was his safe place.

After we reconnected, I learned that Michael has suffered many tragedies in his life. When he was 14, the FBI raided his home and arrested his father as a spy working at Edgewood Arsenal. His mom was addicted to prescription medications. Just a few years ago, Michael's adopted son, Illya, committed suicide while on the phone with Michael. Michael was able to notify the police in Illya's city but neglected to tell them not to use sirens. Michael could hear the sirens over the phone, as his son said, "Dad, you called the cops." The next sound Michael heard was a gunshot as Illya shot himself in the head.

I am writing this letter to request that you show leniency in Michael's sentencing. He is not a violent man. What he did was morally, ethically, and legally wrong. His own experiences are not excuses for the terrible crime he committed. However, I have processed all of this and believe that Michael's lifetime of trauma finally became too much for him to bear and he imploded. Michael needs help in a psychiatric facility, not a prison. He is a brilliant individual with many gifts. He needs healing, not punishment. If Michael is incarcerated, it is my belief that he will not survive. He has a lot of work ahead of him to rebuild his life. The families he represented in sexual abuse cases are disappointed and confused. *How could Michael Dolce do this?*

I am hopeful that you find it in your heart to give Michael the opportunity to undergo treatment for his mental health issues and to make something productive of the rest of his life. As his teacher and now his friend, I will not turn away from Michael. He needs the support of those who know a different Michael, a Michael who fights for justice and helps those who need it. Prison will not solve any of Michael's problems or the problems of society. He will languish and be preyed upon. He deserves consequences, but not in jail. I implore you to give Michael Dolce the opportunity to make things right for himself and for those who care about him.

Sincerely

Gemma Hoskins

1992 Maryland Teacher of the Year



12-11-23

12/12/23

RE: Michael Dolce

To whom it may concern:

My name is Brent K. Deviney and I have personally known Michael Dolce for over 20 years, having met him when I began attending services at Holy Trinity Episcopal Church in WPB, FL. I was always amazed by his calm and polite demeanor towards people of all ages. I've witnessed him in the role of Father, Husband and teacher both inside and outside of the church. He's a caring, loving and compassionate human being that served the needs of numerous people. I was one of those people that he helped. Michael was kind enough to allow me to put him on my phone list and call him when I was in prison from July 2014 through August 2019. The ability to communicate with Michael and his wife Mandy while I was incarcerated was extremely helpful to me. He would keep me up to date with the church and the rest of the congregation. He said that "we continue to pray for you and your safe return every Sunday at service." That's the kind of person that Michael Dolce is and I will never forget the love and support he extended to me when I needed it the most. In closing, whether he was teaching Sunday school classes to the students at church, or performing miracles for the countless victims he legally represented, or being the most encouraging Father and husband, Michael was respectful, patient and nurturing in his efforts to serve others.

With Gratitude,

Brent K. Deviney

**Robert Gorman**  
6861 Brook Hollow Road  
Lake Worth, FL 33467-7215

December 12, 2023

Re: Michael Dolce

To Whom It May Concern:

I am writing to support leniency and mercy in the sentencing of Michael Dolce.

He has willingly pled guilty to his heinous behavior and I ask the court to weigh Michael's admitted weakness of character with his many examples of exceptional character. I firmly believe that he is an ideal candidate for therapy, rehabilitation, and subsequent redemption through public service.

Since I met Michael in approximately 2010, he was a pillar of our church community, Holy Trinity Episcopal Church of West Palm Beach. His leadership and selfless commitment were an inspiring example to his fellow parishioners.

Over the years and nearly every Sunday, scores of families entrusted their young children to his care and Christian education. His record of service and behavior was exemplary and without blemish.

I recall the love that was present in his household, when he, his dear wife Mandy and their young son, Luke, received my son and me to celebrate the New Year several years ago. Many, many friends of theirs came to share the joy, fellowship and love that permeated their home and their community of friends.

Later, I shared the unbearable heartache Michael was dealt when his adopted son, Ilya, ended his life while on the phone with Michael. Long before, I had personally witnessed Ilya's aberrant behavior, which were a symptom of the tragic mental illness he had been born with. Michael and the larger Dolce family unflinchingly bore the burden of raising and loving a mentally ill son—a burden of love that would crush all but those with the strongest of character among us. Ilya's suicide would cause any parent to crumble and Michael's resilient character is another example of his value to society.

Michael's professional legacy on the national scene is legendary in opening the courts to victims of sexual abuse well beyond the prior, restrictive statutes of limitations. What an inspiration he has been to his profession. What a major, loving contribution he has made to victims of sexual abuse everywhere.

If given the opportunity to receive the right therapy, I confidently predict he will earnestly commit himself to rehabilitation and go on to constructively contribute to society in ways that no other could. I believe it is only outside of prison that he can find and engage in proper therapy – perhaps thanks to your consideration of a suspended sentence.

I'm honored to be among those who know Michael, and I entreat the court to sentence him with all the leniency and mercy possible so that he can receive appropriate therapy.

Sincerely,

- Robert Gorman